APPENDIX E. Public Comments and Response

APPENDIX E. Public Comments and Response

The 30-day public comment period for the FY2004 State of Indiana Consolidated Plan Update was held between April 1 and April 30. Two public hearings were conducted on April 19 and 20 2004, between 2 and 4 p.m. in the cities of Crawfordsville and Greenwood. Copies of the public comments received and the State's response are included in this section.



ATTIC, INC.

(A Resource Center for Independent Living)

1721 Washington Avenue - Vincennes, IN 47591 (812-886-0575 1-800-96ATTIC 812-886-1128(fax) (All numbers. Web Site: www.theattic.org Email: INATTIC1@aol.com

February 04, 2004 Issues for the Consolidated Plan To whom it may concern:

ATTIC serves seven counties, Knox, Davies, Green, Pike, Gibson, Sullivan and Martin. The population for these counties is around 180,000, with 15% being people with disabilities. Housing issues are a great concern in these counties. These Hoosiers need to be able to become independent. A consumer with a low, fixed or only one source of income needs to be able to afford to rent or purchase a home.

The Consolidated plan must encourage housing authorities to:

- Apply for Section 8 Mainstream Program and Housing Choice Fair Share vouchers for rental assistance.
- Present the Section 8 Homeownership Program so that people with disabilities have access to homeownership.

The Consolidated Plan needs to reflect an investment into affordable rental and homeownership with the use of HOME dollars. Begin a "tenant based rental program" using HOME funds.

More vouchers are needed to move adults out of their parent's homes. When wanting to have a home of their own to become more independent, the consumer should not have to wait for them to have enough points to receive the voucher. There are limited vouchers in our counties for housing needs.

Services & Programs

Individual & Systems Advocacy Information & Referral Person-Centered Planning Peer Counseling Parent Liaison
Parent Training Resource Library Skills Training Toy Lending Library Assistive Technology

We need the Indiana Housing Finance Authority:

- To have Indiana comply with the Fair Hosing requirements for accessible features in publicly funded housing.
- Money from the CDBG funds for "accessibility modification program." Expand
 housing choices for low-income people with disabilities. Have money follow the
 voucher for home modification.

Many people with disabilities live off SSI, a down payment or closing cost are major barriers in becoming a homeowner. Utilizing HOME funds can be a source to help supply the funds to increase homeownership for people with disabilities.

Supportive Housing Program for People with Disabilities to integrated home options and real choices, Section 811 funds, should be redirected. Support rental housing developments that use these funds to assist people with incomes of 30% of median income to have access to housing needs. We need vouchers not waiting lists.

Insure new homes are near transportation routes and shopping opportunities. Increase the stock of affordable and accessible housing for people with disabilities. Increase housing for single and family homes.

Modification is a necessity when the new home is bought with the vouchers. Money needs to be available for ramps, doorways and any other means of living accessibility for the consumer to be able to live more independent. Have modification money follow the voucher.

At the Con Plan Regional Forum, the top priorities in housing were the main one's that I have submitted. I feel this Forum was very informative and informational. The attendance was diverse with a variety of interesting representative.

Disability is still one of the largest and fastest growing segments of the population.

Disability has no guidelines, it can occur at any age, race, gender and geographic boundaries. It is part of the human condition that can and has impacted all of us in this society. That is why we must implement these issues and see them become available.

Thank You, Submitted by Jackie Evans

ATTIC, Inc.



May 11, 2004

Ms. Jackie Evans ATTIC, Inc. 1721 Washington Avenue Vincennes, Indiana 47591

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Ms. Evans:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan. We are pleased to know that you found the public forum you attended to be informative and representative of diverse interests.

You suggested a number of activities in strategies in your letter that would provide increased opportunities for affordable housing to Indiana citizens, particularly those with disabilities:

Rental assistance/vouchers. As part of the 2004 Consolidated Planning process, a survey of public housing authorities in primarily rural areas of the State was conducted to better understand the need for the development of additional affordable units and/or tenant based rental assistance. The results of the survey showed that specific housing needs varied depending on the community. As such, your input about the need for additional affordable units in your service areas is very valuable and will be incorporated into the planning process for the allocation of the HUD funds.

As part of its current Action Plan, the State is monitoring the use and allocation of Section 8 vouchers in rural areas and continued funding of this program on the national level. It should be noted that HUD regulations limit TBRA to two years for programs funded through the HOME grant; therefore, TBRA funded through HOME may not be a long-term solution to the housing costs faced by persons with disabilities.

Home modification/accessibility. The State's Housing from Shelters to Homeownership program, which is funded through Federal Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) grant dollars, provides funding for the rehabilitation and new construction of all types of affordable housing, from emergency shelters to permanent supportive housing. In 2004, more than \$10 million is proposed to be allocated to the rehabilitation and development of affordable housing through this program. To obtain more information about the program and how you can apply for funding, please consult the HOME Allocation Plan in Appendix G of the Consolidated Plan or visit the IHFA website at http://www.in.gov/ihfa/comdev/conplan/plan.htm.



30 SOUTH MERIDIAN STREET, SUITE 1000, INDIANAPOLIS, IN 46204
TELEPHONE: (317) 232-7777 • TOLL-FREE WITHIN INDIANA: (800) 872-0371 • FACSIMILE: (317) 232-7778
WORLD WIDE WEB: HTTP://www.indianahousing.org • Equal Opportunity Employer And Housing Agency
Printed on Recycled Paper



Fair housing. All housing developments funded using CDBG and HOME dollars must comply with relevant provisions of the American with Disabilities Act and Fair Housing Act.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Sheryl M. Sharpe Director of Operations

SherylM Sharpe

CITY OF MONTPELIER

300 West Huntington Street Montpelier, Indiana 47359-1006 Phone 765-728-2698 FAX 765-728-6505 E Mail cityofmontpelier@hotmail.com OUTSTANDING COMMUNITY AWARDS

1985 - 1986 - 1988 - 1991 - 1995
COMMUNITY EXCELLENCE AWARD
1987
MAIN STREET AWARD - 1987
TREE CITY USA - 1990 - 1991 - 1992 - 1993 - 1994
1995 - 1996 - 1997 - 1998 HOME TOWN PRIDE AWARD - 1992



Feb. 10, 2004

To Whom It May Concern;

As Mayor of Montpelier, IN, I'm writing this letter in support of the State's Consolidated Plan.

We are a community of about 2000 and we are finding it harder and harder to keep up with the growing demands put on the city. With sewer separations, our aging Infrastructure and the need for new community projects we are at the end of the trail trying to find funding for these projects.

We as a city are in need of a new Community Building, we need a new or should I say larger Police station, we also still have approximately 30% of our sewer separation yet to finish. With budgets as tight as they are and no new monies to draw from, a lot of these types of projects just will never get done. We have raised our water and sewer rates about as high as we dare at this point to do what we have, but now its got people thinking about moving to get away from the higher bills, although they will find them as high in most areas.

So the bottom line is we, as a city need HELP! If there is any way possible we need the State's Consolidated Plan to become a reality. Our future lies with it.

Thank you for considering it.

Best Regards:

James A. McPherson - Mayor

Larrer o gas og spreas ja telk og far elkt av fikta



3773 Cherry Creek North Drive Suite 850 Denver, Colorado 80209-3827 302321.2547 fax 303.399.0448 www.bbcresearch.com bbc@bbcresearch.com

May 10, 2004

Mayor James A. McPherson City of Montpelier 300 West Huntington Street Montpelier, Indiana 47359-1005

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Mayor McPherson:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and appreciates your contribution to the Plan.

The Federal Community Development Block Grant (CDBG) program provides funds that can be used in small communities like yours for a range of improvements, including those made to public infrastructure. The Community Focus Fund that is administered by the Indiana Department of Commerce and uses CDBG monies funds projects such as water, sewer, street and related improvements; construction of public facilities; and commercial rehabilitation and downtown revitalization projects. We encourage you to investigate how your community may benefit from the program by reading Appendix G of the FY2004 Consolidated Plan, specifically the CDBG Allocation Plan. For more information on the CDBG and Community Focus Fund programs, please contact Kelly Boe, Manager of Finance and Administration, 317.232.8831.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Heidi Aggeler Director

HeidiAggler



www.hoosieruplands.org

Administrative Office 521 WEST MAIN STREET MITCHELL, INDIANA 47446 (812) 849-4457 or 1-800-333-2451 FAX (812) 849-4467

=== Helping People Since 1966 ====

February 12, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol Ave., Suite 700 Indianapolis, IN 46204-2248

Re: 2004 Consolidated Plan

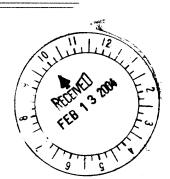
Dear Ms. Boe:

I am writing to offer my comments regarding the preparation of the 2004 Consolidated Plan for the State of Indiana.

As a non profit agency Director operating in a very rural part of southern Indiana, I can attest to the challenges rural areas face in trying to meet the housing needs in these small communities.

First, the 2003 consolidated plan earmarked \$300,000 for infrastructure in support of affordable housing. This amount is woefully inadequate and its control by the Indiana Department of Commerce ("IDOC") requires grant applicants to submit proposals to two separate funding agencies for a single project. As often happens, the funding rounds of both IDOC and the Indiana Housing Finance Authority ("IHFA") are on different cycles during the year. I would like to suggest the state's consideration for earmarking \$1,000,000 in CDBG funds for infrastructure in support of affordable housing. Furthermore, the transfer of these funds and this activity to the Indiana Housing Finance Authority would facilitate a more efficient method of accessing and utilizing these funds. This change would increase the CDBG funds allocated to IHFA from \$5,000,000 to \$6,000,000 and demonstrate a greater commitment to the many affordable housing needs in this state along with sustaining IDOC's historic commitment to infrastructure.

Second, the state of Indiana has one of the highest homeownership rates and foreclosure rates in the country while, according to the 2000 Census, 33.3% of the renter households in the state of Indiana are rent burdened because they pay more than 30% of their household income for housing related expenses. In 2003, IHFA committed 21% of the state's HOME allocation and (I believe) 100% of its annual dividend to the First HOME program. Furthermore, the HOME funds allocated to the state are intended to be for areas outside of participating jurisdictions that receive their own allocation of HOME funds. Although I do not have any statistics, I would assume (given the concentration of



population and participating lenders in urban areas) that a majority of the HOME funds used for the First HOME program are spent in major metropolitan areas that are already participating jurisdictions under the HOME program. I recommend that the commitment to the First HOME program be scaled back to 10% of the state's HOME allocation with the remaining HOME funds re-directed to address rental and special needs housing issues facing smaller communities in Indiana.

Thank you for the opportunity to provide recommendations for the 2004 Consolidated Plan Annual Update.

Sincerely,

David L. Miller,

Chief Executive Officer

c: The Honorable Kathy Davis, Lt. Governor

The Honorable Eric Koch, State Representative

The Honorable Becky Skillman, State Senator

The Honorable Richard Young, State Senator

The Honorable Jerry Denbo, State Representative





May 10, 2004

Mr. David Miller Hoosier Uplands 521 West Main Street Mitchell, Indiana 47446

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Mr. Miller:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

You raised two main concerns in your letter: funding for affordable housing infrastructure and the allocation of HOME Investment Partnerships Program (HOME) dollars to the First Home Program.

The State's current allocation of Community Development Block Grant (CDBG) dollars for affordable housing infrastructure is based on historical demand for such projects. As noted in the 2004 Plan, the \$300,000 proposed allocation represents the amount that is likely to be allocated for this activity if grant applications are representative of those in past years. More or less might be spent on affordable housing infrastructure during the 2004 program year if demand for the projects differs from what it has been in the past. In the past, the use of CDBG funds for affordable housing infrastructure has not been the most efficient method of maximizing the amount of grant dollars that assist low income populations. As such, the State plans to leave the allocation goal at \$300,000 for the current program year.

The State's priority for the use of CDBG funds is to focus on preservation of affordable housing. This is accomplished through public infrastructure improvements that help low and moderate income populations receive adequate public services without substantial increases in costs.

Since program inception, IHFA has allocated approximately 73% of Indiana's HOME funds outside of participating jurisdictions and the remaining 27% within the participating jurisdiction areas.

The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home.

You will be pleased to know that for the 2004 program year, only 9 percent of HOME funds are proposed to be allocated to the State's First Home program.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe Manager, Finance and Administration

Indiana Department of Commerce

Sheryl Sharpe

Director of Operations

SharfM Sharpe

Indiana Housing Finance Authority

TERRENCE J. KEUSCH, ESQ. PIONEER DEVELOPMENT SERVICES, INC. 3405 Oakton Circle Greenwood, Indiana 46143

Phone: (317) 422-9389 Fax: (317) 422-5246 E-mail: pioneerdev@insightbb.com

February 12, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol Ave., Suite 700 Indianapolis, IN 46204-2248

Re: 2004 Consolidated Plan

Dear Ms. Boe:

Thank you for providing the opportunity to comment on the 2004 Consolidated Plan for the State of Indiana.

My firm deals almost exclusively in the development of affordable housing projects in the State of Indiana and, as such, works with many nonprofit organizations around the state to foster affordable housing in their communities. Given the limited resources dedicated to affordable housing in Indiana, these organizations find it very difficult to develop rental properties that provide very affordable rents for low to moderate income individuals and families and that operate efficiently and effectively for the organizations. Therefore, I would like to take this opportunity to offer some suggestions for improving the 2004 Consolidated Plan.

First, there is an overwhelming use of CDBG CFF funds for water/sewer. While this activity is deemed a priority, it certainly is not such an overwhelming priority to the extent it is funded. As Priority 1, the proposed allocation for water/sewer is \$15,000,000; while as Priority 2, the proposed allocation for affordable housing infrastructure is merely \$300,000. This is an extreme disparity. I would suggest allocating at least \$1,000,000 (if not more) to affordable housing infrastructure. Consideration should also be given to transferring the responsibility of allocating these funds from IDOC to IHFA (whose mission is to foster affordable housing in Indiana) so as to streamline for developers the process of accessing funds earmarked for affordable housing.

Second, it seems that an inordinate percentage of the State's HOME allocation is dedicated to the First HOME program relative to the percentage dedicated to rental housing and special needs housing. The State of Indiana has one of the highest homeownership rates and one of the highest foreclosure rates in the country. In addition, approximately 1/3 of the renter households in the State of Indiana pay more than 30% of their household income for housing related expenses, creating an extreme financial burden on households. Re-allocating more of the State's HOME allocation from the First HOME program to rental housing and special needs housing will help nonprofits develop safe, decent, and truly affordable housing projects in their communities.

Thank you for your consideration.

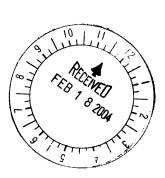
Sincerely,

President

Terrence J. Keusch

cc: The Honorable Kathy Davis, Lt. Governor The Honorable Denny Oxley, State Representative

The Honorable Lindel Hume, State Senator







May 12, 2004

Mr. Terrence J. Keusch Pioneer Development Services 3405 Oakton Circle Greenwood, Indiana 46143

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Mr. Keusch:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

You raised two main concerns in your letter: funding for affordable housing infrastructure and the allocation of HOME investment Partnerships Program (HOME) dollars to the First Home Program.

The State's current allocation of Community Development Block Grant (CDBG) dollars for affordable housing infrastructure is based on historical demand for such projects. As noted in the 2004 Plan, the \$300,000 proposed allocation represents the amount that is likely to be allocated for this activity if grant applications are representative of those in past years. More or less might be spent on affordable housing infrastructure during the 2004 program year if demand for the projects differs from what it has been in the past. In the past, the use of CDBG funds for affordable housing infrastructure has not been the most efficient method of maximizing the amount of grant dollars that assist low income populations. As such, the State plans to leave the allocation goal at \$300,000 for the current program year.

The State's priority for the use of CDBG funds is to focus on preservation of affordable housing. This is accomplished through public infrastructure improvements that help low and moderate income populations receive adequate public services without substantial increases in costs.

Since program inception, IHFA has allocated approximately 73% of Indiana's HOME funds outside of participating jurisdictions and the remaining 27% within the participating jurisdiction areas.

The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home. You will be pleased to know that for the 2004 program year, only 9 percent of HOME funds are proposed to be allocated to the State's First Home program.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe

Manager, Finance and Administration Indiana Department of Commerce

Sheryl Sharpe

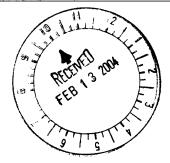
Director of Operations

Sherzl M. Sharpe

Indiana Housing Finance Authority

February 12, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol Ave., Suite 700 Indianapolis, IN 46204-2248



Re: 2004 Consolidated Plan

Dear Ms. Boe:

I am writing to offer my comments regarding the preparation of the 2004 Consolidated Plan for the State of Indiana.

As a consultant working with multiple non-profit organizations around the state, I have experienced the challenges communities face in working with limited and fragmented resources to address the many community development needs in Indiana.

First, the 2003 consolidated plan earmarked \$300,000 for infrastructure in support of affordable housing. This amount is woefully inadequate and its control by the Indiana Department of Commerce ("IDOC") requires grant applicants to submit proposals to two separate funding agencies for a single project. As often happens, the funding rounds of both IDOC and the Indiana Housing Finance Authority ("IHFA") are on different cycles during the year. I would like to suggest the state's consideration for earmarking \$1,000,000 in CDBG funds for infrastructure in support of affordable housing. Furthermore, the transfer of these funds and this activity to the Indiana Housing Finance Authority would facilitate a more efficient method of accessing and utilizing these funds. This change would increase the CDBG funds allocated to IHFA from \$5,000,000 to \$6,000,000 and demonstrate a greater commitment to the many affordable housing needs in this state along with sustaining IDOC's historic commitment to infrastructure.

Second, the state of Indiana has one of the highest homeownership rates and foreclosure rates in the country while, according to the 2000 Census, 33.3% of the renter households in the state of Indiana are rent burdened because they pay more than 30% of their household income for housing related expenses. In 2003, IHFA committed 21% of the state's HOME allocation and (I believe) 100% of its annual dividend to the First HOME program. Furthermore, the HOME funds allocated to the state are intended to be for areas outside of participating jurisdictions that receive their own allocation of HOME funds. Although I do not have any statistics, I would assume (given the concentration of

8152 Castilla Drive • Indianapolis, IN 46236 • (317) 826-3488 Phone • (317) 826-8233 Fax www.milestoneventuresinc.com

population and participating lenders in urban areas) that a majority of the HOME funds used for the First HOME program are spent in major metropolitan areas that are already participating jurisdictions under the HOME program. I recommend that the commitment to the First HOME program be scaled back to 10% of the state's HOME allocation with the remaining HOME funds re-directed to address rental and special needs housing issues facing smaller communities in Indiana.

Thank you for the opportunity to provide recommendations for the 2004 Consolidated Plan Annual Update.

Sincerely.

Charles Heintzelman

Principal

cc: The Honorable Kathy Davis, Lt. Governor

The Honorable Brian Bosma, State Representative The Honorable James W. Merritt, Jr., State Senator



VENTURES, INC.

April 14, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol Ave., Suite 700 Indianapolis, IN 46204-2248

Re: 2004 Consolidated Plan

Dear Ms. Boe:

I am writing to offer my comments regarding the draft 2004 Consolidated Plan for the State of Indiana.

It is remarkable that community forum participants who took the time and effort to attend the input sessions ranked "Infrastructure in Support of Affordable Housing: as the third highest priority in the state, yet the 2004 draft plan has disregarded this input and earmarked just 1% (less than \$300,000) of the CDBG allocation for this activity. Furthermore, no apparent changes have been proposed to make accessing funds for this activity easier to use or coordinate with other housing related funds.

Neither previous application demand nor historical funding levels for Infrastructure in Support of Affordable Housing are reliable measures of the need for this activity. Infrastructure in Support of Affordable Housing has been identified as one of the top three community development needs for the past two years, yet it remains an activity that is given little importance, grossly underfunded, and procedurally difficult to utilize.

I urge the Indiana Department of Commerce to dedicate a minimum of \$1,000,000 in CDBG funds for Infrastructure in Support of Affordable Housing and transfer these funds and the administrative oversight of this activity to the Indiana Housing Finance Authority. This commitment would not only recognize a consistent articulated need in this state, but it would also eliminate the coordination barriers associated with IDOC and IFHA funding that exists under the current funding arrangement.

Thank you for the opportunity to provide comments on the 2004 Draft Consolidated Plan.

Sincerely,

Charles Heintzelman

Principal

8152 Castilla Drive • Indianapolis, IN 46236 • (317) 826-3488 Phone • (317) 826-8233 Fax www.milestoneventuresinc.com





May 12, 2004

Mr. Charles Heintzelman Milestone Ventures, Inc. 8152 Castilla Drive Indianapolis, Indiana 46236

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Mr. Heintzelman:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

You raised two main concerns in your letter: funding for affordable housing infrastructure and the allocation of HOME Investment Partnerships Program (HOME) dollars to the First Home Program.

The State's current allocation of Community Development Block Grant (CDBG) dollars for affordable housing infrastructure is based on historical demand for such projects. As noted in the 2004 Plan, the \$300,000 proposed allocation represents the amount that is likely to be allocated for this activity if grant applications are representative of those in past years. More or less might be spent on affordable housing infrastructure during the 2004 program year if demand for the projects differs from what it has been in the past. In the past, the use of CDBG funds for affordable housing infrastructure has not been the most efficient method of maximizing the amount of grant dollars that assist low income populations. As such, the State plans to leave the allocation goal at \$300,000 for the current program year.

The State's priority for the use of CDBG funds is to focus on preservation of affordable housing. This is accomplished through public infrastructure improvements that help low and moderate income populations receive adequate public services without substantial increases in costs.

Since program inception, IHFA has allocated approximately 73% of Indiana's HOME funds outside of participating jurisdictions and the remaining 27% within the participating jurisdiction areas.

The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home.

You will be pleased to know that for the 2004 program year, only 9 percent of HOME funds are proposed to be allocated to the State's First Home program.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe

Manager, Finance and Administration Indiana Department of Commerce

Sheryl M. Sharpe Sheryl Sharpe

Director of Operations

Indiana Housing Finance Authority



February 16, 2004

Kelly Boe Controller's Office, Grants Management Division Indiana Department of Commerce One North Capital Avenue, Suite 700 Indianapolis, IN 46204



Dear Ms. Boe

While members of my staff and I were able to participate in one of the meetings you hosted on the 2004 Consolidated Plan, I feel it is important to write and share with you some additional comments on the Plan.

Housing remains one of the most important quality of life issues in Hoosier communities. Any residents in the areas served by Area Five continue to struggle to find safe, decent and affordable housing. Our Agency works to address these issues, especially for low-and moderate-income households.

While most of the past efforts at our Agency have been directed toward creating new rental housing and home ownership opportunities, we our seeing a shift in the needs in the communities we serve in Cass, Fulton, Howard, Miami, Tipton, and Wabash counties. I am recommending that owner-occupied rehabilitation be recognized as a housing priority in the 2004 Consolidated Plan Annual Update.

Like most of Indiana, communities in the counties served by Area Five Agency consist largely of aging housing stock. The inability of many homeowners to maintain these older homes in an appropriate manner is a dilemma that these communities are struggling to address. The burden of these costs is shared by homeowners of every age group, every ethnic group, and many income levels. The problem only grows with time, as the homes continue to age and deteriorate, and is exacerbated by the increased tax burden placed on the owners of older homes under the recent reassessment.

AGENCY ON AGING & COMMUNITY SERVICES

1801 SMITH STREET LOGANSPORT, IN 46947-1576 (574)722-4451 FAX (574)722-3447 In his recent State of the City address, Logansport Mayor Michael Fincher identified the rehabilitation of existing housing stock as a top priority of his new administration. He based this prioritization on his discussion with citizens of Logansport, on the finding of the community's Vision process, and on research done by the Logansport Housing Task Force. The proposal in 2003 of a new city Property Maintenance Ordinance was met by a chorus of cries from homeowners who would be required to make repairs under the ordinance but who do not have the ability to fund the repairs on their homes.

I use Logansport as an example, but the problem is widespread. According to the 2000 U.S. Census, the median construction date for owner-occupied housing in our state is 1966. In the heart of many of our cities, the average home is even older. What is a problem today promises to be a crisis in the near future if not addresses.

In addition to housing, our communities face other concerns, in keeping with the state's recent efforts to improve downtowns, our Agency recommends that downtown preservation be a priority in the 2004 Consolidated Plan Annual Update. There are a number of projects eligible for CDBG funds that can be instrumental in improving downtowns, including Streetscape projects, the creation of downtown housing – especially upper floor housing, historic preservation, and infrastructure improvements. Many Hoosier communities are small and medium towns; without a strong downtown, these communities lose the identities and the character that makes our hometowns special. Please allow us the tools to address the needs of these unique and diverse communities.

My thanks to you and to the other state agencies involved in the meetings and in the update of the 2004 Consolidated Plan. I appreciate the time and effort expended toward that task, and I thank you for the opportunity to make these comments.

Sincerely.

Therese Bath

Director of Development





May 21, 2004

Ms. Therese Bath
Director of Development
Agency on Aging & Community Services
1801 Smith Street
Logansport, IN 46947-1576

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Ms. Bath:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan. Your input about the need for housing rehabilitation in your service areas is very valuable and will be incorporated into the planning process for the allocation of the HUD funds.

You will be happy to know that the 2004 Consolidated Plan gives priority to many of the activities you highlight in your letter. For 2004, the State has proposed over \$4 million be allocated to rehabilitation of owner occupied housing. In addition, Community Development Block Grant (CDBG) funds will remain available for downtown revitalization projects. However, because the CDBG regulations require that 70 percent of the grant funding be used to benefit low and moderate income populations, revitalization projects can be challenging to fund through CDBG.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe

Manager, Finance and Administration Indiana Department of Commerce

Sheryl Sharpe

Director of Operations

Indiana Housing Finance Authority

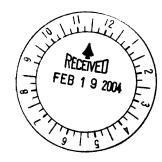
FOUR COUNTY COUNSELING CENTER

Healing with Compassion and Respect

February 17, 2004

MAIN OFFICE 1015 Michigan Ave. Logansport, IN 46947-1597 Phone: 574-722-5151 Emergency: 1-800-552-3106 Fax: 574-722-9523 TTY: 574-722-5993

Consolidated Plan Indiana Department of Commerce Controller's Office Grants Management Division One North Capitol Avenue Suite 700 Indianapolis, IN 46204-2248



CASS COUNTY OUTPATIENT SERVICES 1807 Smith St. Logansport, IN 46947-1576 Phone: 574-732-1414 Fax: 574-732-0504

Dear Sirs;
I am direc

FULTON COUNTY 401 E 8" Street, Ste. A Rochester, IN 46975-1499 Phone: 574-223-8565 Fax: 574-223-8786 I am directing this correspondence to you to request that the State Housing Plan is drafted to support housing for the mentally ill disabled population. As the Executive Director of the Four County Counseling Center in Logansport, Indiana, we have been able to accumulate 31 apartments through various funding sources to provide housing for the clients that we serve in a four county area; those counties being Cass, Fulton, Pulaski, and Miami. We regularly have needs for approximately 25 to 40 additional apartment units for clients, which we have a great difficulty in placing.

MIAMI COUNTY 655 E. Main Street Peru, IN 46970-2662 Phone: 765-472-1931 Fax: 765-472-1945 With the Olmstead ruling by the Supreme Court, which has lowered the number of clients residing in the state hospitals, the critical need that we face in an effort to matriculate these people into the community, is housing. Indiana's 30 mental health centers provide a number of community-based resources for supporting of these individuals, with the exception of housing. In our particular area, we are competing with housing needs for workers from the local packing plant and therefore, there is a shortage. There is a critical need for additional single occupancy units, as well as a limited number of multiperson units.

PULASKI COUNTY 616 W. 11th St. Winamac, IN 46996-1208 Phone: 574-946-4233 Fax: 574-946-4365 We have worked closely in the past with the Area Five Council on Aging, who has been successful in obtaining a number of grants to provide funding for seniors, and assist us in renovating the local Masonic Lodge, which provided 23 housing units for the populations that we serve.











A Community Partner Since 1975

I would advocate that the need is as serious in the rural areas as it is in the urban areas, simply due to the fact that we do not have the resources and employment available to provide disabled individuals with appropriate housing.

I had intended to attend the Rensselaer Public Hearing, but due to a conflict, I was unable to do so. My intention was to express my concerns and the concerns of our four counties at that meeting.

I would hope that in the drafting of our State Plan, you will make the appropriate comments and identify the fact that those individuals suffering from mental illness and chronic substance abuse are in grave need. I would support any and all efforts that could occur in this vital area.

Yours truly,

Lawrence R. Ulrich Executive Director/CEO



Mr. Lawrence Ulrich Executive Director/CEO Four County Counseling Center 1015 Michigan Avenue Logansport, IN 46947-1597

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Mr. Ulrich:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

As part of the 2004 Consolidated Planning process, a survey of public housing authorities in primarily rural areas of the State was conducted to better understand the need for the development of additional affordable units and/or tenant based rental assistance. The results of the survey showed that specific housing needs varied depending on the community. As such, your input about the need for additional affordable units in your service areas is very valuable and will be incorporated into the planning process for the allocation of the HUD funds

The State's Housing from Shelters to Homeownership program, which is funded through Federal Community Development Block Grant and HOME Investment Partnerships Program grant dollars, provides funding for the rehabilitation and new construction of all types of affordable housing, from emergency shelters to permanent supportive housing. In 2004, more than \$10 million is proposed to be allocated to the rehabilitation and development of affordable housing through this program. To obtain more information about the program and how you can apply for funding, please consult the HOME Allocation Plan in Appendix G of the Consolidated Plan or the IHFA website at http://www.in.gov/ihfa/comdev/conplan/plan.htm.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Sheryl M. Sharpe

Shengl M. Shanpe

Director of Operations



30 South Meridian Street, Suite 1000, Indianapolis, IN 46204 Telephone: (317) 232-7777 • Toll-Free Within Indiana: (800) 872-0371 • Facsimile: (317) 232-7778 WORLD WIDE WEB: http://www.indianahousing.org • Equal Opportunity Employer And Housing Agency PRINTED ON RECYCLED PAPER



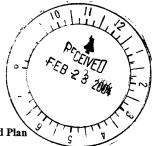
RISING SUN & OHIO COUNTY SENIOR CITIZENS HOUSING, INC.

212 South Poplar Street Rising Sun, IN 47040

812-438-3521

February 18, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol Ave., Suite 700 Indianapolis, IN 46204-2248



Re:

2004 Consolidated Plan

Dear Ms. Boe:

As a non-profit organization working in Southeastern Indiana, we have experienced the challenges a small community faces in working with limited resources to meet the supply and demand of community development needs.

To support affordable housing in 2003 the plan supported infrastructure in the amount of \$300,000.00. Knowing this amount will only a small percentage of needs in the State of Indiana, wouldn't it be in the best interest of ("IDOC) Department of Commerce and ("IHFA") to work together to be able to provide grants on the same time frames as one another and not on different cycles? We, as a non-profit, highly recommend that the support for infrastructure for affordable housing be given a much higher amount than in previous years. We, as State Agencies, need to provide stronger commitments to affordable housing for the future of our communities to stay strong.

The State of Indiana needs greater support in affordable housing because we face one of the highest foreclosure rates in the country. Giving better education and guidance to our first-time homebuyers needs greater attention also. How many households pay more than 30% of their household income for housing related expenses? It seems every year this increases to a greater amount. We are the smallest county in the State of Indiana by size and population, and know that in the past that a significant portion of IHFA HOME funds are being spent in major metropolitan areas. We know from experience that rental and special needs housing issues continue to face smaller communities in Indiana at a greater percentage than the major metropolitan areas. What are we going to do to make this better for the smaller communities in our State?

Thank you for your consideration in allowing me to provide information to you that we face on a daily basis.

Sincerely.

timmy J. Tammy J. Johns Vice-President

The Honorable Kathy Davis, Lt. Governor

The Honorable Robert Bischoff, State Representative

The Honorable Johnny Nugent, State Senator





May 12, 2004

Ms. Tammy Johns Rising Sun & Ohio County Senior Citizens Housing, Inc. 212 South Poplar Street Rising Sun, Indiana 47040

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Ms. Johns:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

The State's current allocation of Community Development Block Grant (CDBG) dollars for affordable housing infrastructure is based on historical demand for such projects. As noted in the 2004 Plan, the \$300,000 proposed allocation represents the amount that is likely to be allocated for this activity if grant applications are representative of those in past years. More or less might be spent on affordable housing infrastructure during the 2004 program year if demand for the projects differs from what it has been in the past. In the past, the use of CDBG funds for affordable housing infrastructure has not been the most efficient method of maximizing the amount of grant dollars that assist low income populations. As such, the State plans to leave the allocation goal at \$300,000 for the current program year.

The State's priority for the use of CDBG funds is to focus on preservation of affordable housing. This is accomplished through public infrastructure improvements that help low and moderate income populations receive adequate public services without substantial increases in costs.

Since program inception, IHFA has allocated approximately 73% of Indiana's HOME funds outside of participating jurisdictions and the remaining 27% within the participating jurisdiction areas.

The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home. In addition, during the 2004 program year, \$1,000,000 of HOME funds are proposed to be allocated to Homeownership Counseling and Downpayment Assistance.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe

Manager, Finance and Administration Indiana Department of Commerce

Sheryl Sharpe

Director of Operations

SherylM. Sharpe

Indiana Housing Finance Authority



Housing Opportunities, Inc.



2801 Evans Avenue • Valparaiso, IN 46383 • 219-462-3726 FAX: 219-464-9635 • www.portercohousing.org



February 23, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol Ave., Suite 700 Indianapolis, IN 46204-2248

Re: 2004 Consolidated Plan

Dear Ms. Boe:

I am writing to offer my comments regarding the preparation of the 2004 Consolidated Plan for the State of Indiana.

First, the 2003 consolidated plan earmarked \$300,000 for infrastructure in support of affordable housing. This amount is woefully inadequate and its control by the Indiana Department of Commerce ("IDOC") requires grant applicants to submit proposals to two separate funding agencies for a single project. As often happens, the funding rounds of both IDOC and the Indiana Housing Finance Authority ("IHFA") are on different cycles during the year. I would like to suggest the state's consideration for earmarking \$1,000,000 in CDBG funds for infrastructure in support of affordable housing. Furthermore, the transfer of these funds and this activity to the Indiana Housing Finance Authority would facilitate a more efficient method of accessing and utilizing these funds. This change would increase the CDBG funds allocated to IHFA from \$5,000,000 to \$6,000,000 and demonstrate a greater commitment to the many affordable housing needs in this state along with sustaining IDOC's historic commitment to infrastructure.

Second, the state of Indiana has one of the highest homeownership rates and foreclosure rates in the country while, according to the 2000 Census, 33.3% of the renter households in the state of Indiana are rent burdened because they pay more than 30% of their household income for housing related expenses. In 2003, IHFA committed 21% of the state's HOME allocation and (I believe) 100% of its annual dividend to the First HOME program. I recommend that the commitment to the First HOME program be scaled back to 10% of the state's HOME allocation with the remaining HOME funds re-directed to address rental and special needs housing issues facing smaller communities in Indiana.



Year after year, the priorities that are expressed in the public input process (surveys, forums and hearings) do not match the allocation plans that are implemented. As I have attended many of the consolidated plan meetings, housing is always the number one unmet need yet very few DOC dollars are allocated to housing. Why ask for our opinion if it is not going to be used for the plan and distribution of funds.

Thank you for the opportunity to provide recommendations for the 2004 Consolidated Plan Annual Update.

Sincerely,

Cardushok
Caroline Shook

Executive Director

cc: The Honorable Kathy Davis, Lt. Governor

The Honorable Duane Cheney, State Representative The Honorable Nancy Dembowski, State Senator





May 12, 2004

Ms. Shook Executive Director Housing Opportunities, Inc. 2801 Evans Avenue Valparaiso, Indiana 46383

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Ms. Shook:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

You raised two main concerns in your letter: funding for affordable housing infrastructure and the allocation of HOME Investment Partnerships Program (HOME) dollars to the First Home Program.

The State's current allocation of Community Development Block Grant (CDBG) dollars for affordable housing infrastructure is based on historical demand for such projects. As noted in the 2004 Plan, the \$300,000 proposed allocation represents the amount that is likely to be allocated for this activity if grant applications are representative of those in past years. More or less might be spent on affordable housing infrastructure during the 2004 program year if demand for the projects differs from what it has been in the past. In the past, the use of CDBG funds for affordable housing infrastructure has not been the most efficient method of maximizing the amount of grant dollars that assist low income populations. As such, the State plans to leave the allocation goal at \$300,000 for the current program year.

The State's priority for the use of CDBG funds is to focus on preservation of affordable housing. This is accomplished through public infrastructure improvements that help low and moderate income populations receive adequate public services without substantial increases in costs.

Since program inception, IHFA has allocated approximately 73% of Indiana's HOME funds outside of participating jurisdictions and the remaining 27% within the participating jurisdiction areas.

The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home. You will be pleased to know that for the 2004 program year, only 9 percent of HOME funds are proposed to be allocated to the State's First Home program.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe

Manager, Finance and Administration Indiana Department of Commerce

Sheryl Sharpe

Director of Operations

Sheryl M. Sharpe

Indiana Housing Finance Authority

Providence Housing Corporation 8037 Unruh Drive Georgetown, Indiana 47122 812-951-1878

February 24, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol Avenue - Suite 700 Indianapolis, Indiana 46204-2248

Re: 2004 Consolidated Plan

Dear Ms. Boe:

The following comments address the preparation of the 2004 Consolidated Plan for the State of Indiana.

I am president of three not-for-profit corporations in Indiana. The first, Providence Self Sufficiency Ministries, Inc., Georgetown, is devoted to providing educational and family services to people in need. The other two, Providence Housing Corporation, West Terre Haute, and Guerin, Inc., Georgetown, provide safe, decent and affordable housing for children, families, and senior citizens. We consider all three corporations to be "needs driven." That is, we attempt to respond to the needs evident in each individual community.

Regardless of location, the Terre Haute area or southern Indiana, the need for safe and affordable housing continues, especially among young families, single parent families and the elderly. The foundation of Providence Housing Corporation was based in large part on a housing needs assessment conducted in 1998 that revealed that all of the homes in 54 blocks of the 70-block of area of downtown West Terre Haute had a minimum of nine (9) unsound or hazardous conditions per housing unit.

Metro areas of southern Indiana, especially Clark and Floyd counties, are reporting increasing housing costs and values and, for some, above average wages. However, residents of rural areas and small towns, like Georgetown, are discovering that it is increasingly difficult to maintain their own homes. In many instances, high utility costs resulting from outdated and deteriorating infrastructure increase the hardship of senior citizens and families with low-incomes.





None of the hardships related to housing can be eliminated or corrected quickly. Funding is crucial, especially when not-for-profit organizations are pioneering so many of the affordable housing rehabilitation/construction and community development projects.

Providence Housing Corporation is dependent upon grant funding for its projects in West Terre Haute, and has received truly wonderful support from the Department of Commerce and Indiana Housing Finance Authority. With these funds we have rehabilitated 22 homes and constructed 22 two-bedroom apartments for senior citizens and four single-family homes. We will continue providing affordable housing opportunities in the community as long as funding remains available.

Since 1999, Guerin, Inc., has received state funding support as it constructed two group homes for foster children; six apartments for families reuniting with children in foster care and families in danger of separation because they are homeless or live in substandard housing, and a training center office complex that is the site of adult literacy/GED instruction and other training programs. At this time, Guerin, Inc. is seeking additional funding to construct, also at Georgetown and adjacent to the Providence House for Children campus, a senior citizens center and apartments for low-income senior citizens, and, in the next few years, assisted living, adult/child day care and custodial/dementia care facilities. All will increase the quality of life for young and old alike in southern Indiana. The multi-generational programming Guerin, Inc., is creating encourages interaction and mentoring between foster children and senior citizens, provides residents of Floyd County with its first senior citizens center; and alleviates the shortage of safe, affordable housing for senior citizens.

Funding must continue to flow, if improvements to Indiana's infrastructure, housing and communities are to continue. It is my sincere and heartfelt hope that the 2004 Consolidated Plan reflects the importance of and the need for those life-changing projects already in process, and those in the beginning stages by giving funding priority to affordable housing; emergency shelter for families and youth; infrastructure, and elder care.

Thank you for allowing me to share my thoughts with you. With warm regards, I am

Sincerely,

Sister Barbara Ann Zeller, SP

President

CC: Lt. Governor Kathy Davis State Senator Connie Sipes State Representative Bill Cochran



May 21, 2004

Sister Barbara Ann Zeller President Providence Housing Corporation 8037 Unruh Drive Georgetown, IN 47122

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Sister Zeller:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

The State appreciates the hard work of organizations like yours in providing affordable housing to Indiana's citizens in the most need. You will be happy to know that the 2004 Consolidated Plan give priority to many of the activities you highlight in your letter, including affordable housing preservation and development and emergency shelters for families and youth.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Sheryl M. Sharpe Director of Operations

E. Scott for







AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.

February 26, 2004

Ms. Kelly Boe
Indiana Department of Commerce
Controller's Office, Grants Management Division
One North Capitol Ave., Suite 700
Indianapolis, IN 46204-2248

Re: 2004 Consolidated Plan

Dear Ms. Boe:

I am writing on behalf of Area IV Development, Inc., a non-profit affordable housing and community development developer, to offer my comments regarding the preparation of the 2004 Consolidated Plan for the State of Indiana. Area IV Development serves Tippecanoe and the surrounding seven (7) counties in northwest central Indiana.

As a non-profit developer, we have experienced the challenges in working with limited and fragmented resources to address the many affordable housing and community development needs in our service area.

First, the 2003 consolidated plan earmarked \$300,000 for infrastructure in support of affordable housing. This amount is woefully inadequate and its control by the Indiana Department of Commerce ("IDOC") requires grant applicants to submit proposals to two separate funding agencies for a single project. As often happens, the funding rounds of both IDOC and the Indiana Housing Finance Authority ("IHFA") are on different cycles during the year. I would like to suggest the state's consideration for earmarking \$1,000,000 in CDBG funds for infrastructure in support of affordable housing. Furthermore, the transfer of these funds and this activity to the Indiana Housing Finance Authority would facilitate a more efficient method of accessing and utilizing these funds. This change would increase the CDBG funds allocated to IHFA from \$5,000,000 to \$6,000,000 and demonstrate a greater commitment to the many affordable housing needs in this state along with sustaining IDOC's historic commitment to infrastructure.

Second, the state of Indiana has one of the highest homeownership rates and foreclosure rates in the country while, according to the 2000 Census, 33.3% of the renter households in the state of Indiana are rent burdened because they pay more than 30% of their household income for housing related expenses. In 2003, IHFA committed 21% of the state's HOME allocation and (I believe) 100% of its annual dividend to the First HOME program. Furthermore, the HOME funds allocated to the state are intended to be for

660 NORTH 36TH STREET P.O. BOX 4727 LAFAYETTE, INDIANA 47903-4727 765-447-7683 1-800-382-7556 FAX 765-447-6862



Serving Benton, Carroll, Clinton, Fountain, Montgomery, Tippecanoe, Warren and White Counties.



areas outside of participating jurisdictions that receive their own allocation of HOME funds. Although I do not have any statistics, I would assume (given the concentration of population and participating lenders in urban areas) that a majority of the HOME funds used for the First HOME program are spent in major metropolitan areas that are already participating jurisdictions under the HOME program. I recommend that the commitment to the First HOME program be scaled back to 10% of the state's HOME allocation with the remaining HOME funds re-directed to address rental and special needs housing issues facing smaller communities in Indiana.

Thank you for the opportunity to provide recommendations for the 2004 Consolidated Plan Annual Update.

Sincerely,

Horge Chowance &

George Chovancek, AICP Housing Specialist

Gc/

cc: The Honorable Kathy Davis, Lt. Governor

The Honorable Sue Scholer, State Representative

The Honorable Sheila Klinker, State Representative

The Honorable Ron Alting, State Senator

The Honorable Brandt Hershman, State Senator





May 12, 2004

Mr. George Chovancek Housing Specialist Area IV, Agency on Aging 660 North 36th Street Lafayette, Indiana 47903-4727

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Mr. Chovancek:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

You raised two main concerns in your letter: funding for affordable housing infrastructure and the allocation of HOME Investment Partnerships Program (HOME) dollars to the First Home Program.

The State's current allocation of Community Development Block Grant (CDBG) dollars for affordable housing infrastructure is based on historical demand for such projects. As noted in the 2004 Plan, the \$300,000 proposed allocation represents the amount that is likely to be allocated for this activity if grant applications are representative of those in past years. More or less might be spent on affordable housing infrastructure during the 2004 program year if demand for the projects differs from what it has been in the past. In the past, the use of CDBG funds for affordable housing infrastructure has not been the most efficient method of maximizing the amount of grant dollars that assist low income populations. As such, the State plans to leave the allocation goal at \$300,000 for the current program year.

The State's priority for the use of CDBG funds is to focus on preservation of affordable housing. This is accomplished through public infrastructure improvements that help low and moderate income populations receive adequate public services without substantial increases in costs.

Since program inception, IHFA has allocated approximately 73% of Indiana's HOME funds outside of participating jurisdictions and the remaining 27% within the participating jurisdiction areas.

The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home.

You will be pleased to know that for the 2004 program year, only 9 percent of HOME funds are proposed to be allocated to the State's First Home program.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe

Manager Figance and Admin

Manager, Finance and Administration Indiana Department of Commerce

Authority

Sheryl Sharpe

Director of Operations Indiana Housing Finance

SherylM Sharpe



February 27, 2004

Ms. Kelly Boe Indiana Department of Commerce Controller's Office, Grants Management Division One North Capitol, Suite 700 Indianapolis, IN 46204-2248

RE: 2004 Consolidated Plan

Dear Ms. Boe:

Please accept this letter as Area 12 Council on Aging & Community Services, Inc., dba *Life*Time Housing Group's comments on the preparation of the 2004 Consolidated Plan for the State of Indiana. We appreciate the work and effort of you and your staff in the preparation of the Consolidated Plan and hope that you will incorporate some of our recommendations into the draft document.

As a not-for-profit Community Housing Development Organization working with six counties primarily in Southeastern Indiana, we are aware of housing and community development problems that would not be addressed in our service area without the assistance of the programs that are identified in the Consolidated Plan. We appreciate the efforts of the Indiana Housing Finance Authority and the Indiana Department of Commerce in partnering with local entities to solve these problems.

Our first recommendation is to remove the limitation on the amount of in-kind match that a community can contribute to a project. Twenty-five thousand dollars (\$25,000) is woefully low as a maximum for in-kind match. This \$25,000 maximum limitation has been in effect for at least the last twenty-three (23) years and it no longer is reflective of current economic circumstances.

Secondly, the State should consider increasing the amount of money that is set aside for infrastructure in support of housing from the current \$300,000. The State should also consider moving this grant making function over to the Indiana Housing Finance Authority so that it would be easier to synchronize a project that requires both HOME funds and infrastructure in support of housing funds.

Finally, the State should consider eliminating (or greatly reducing) the amount of HOME funds that it allocates to the First HOME program. HOME funds that are allocated to the State are intended to be used for areas outside of participating jurisdictions that receive their own allocation of HOME funds directly from the Department of Housing and Urban Development. It is our contention that a majority of First HOME funds are used by residents within large metropolitan areas and consequently the HOME funds that are



13091 Benedict Dr. • Dillsboro, IN 47018 • Phone: 812-432-5215 • Fax: 812-432-3822

Remembering LifeTime Resources in Your Will and Memorials is a Lasting and Loving Gift



contributed to the First HOME program are not reaching the areas of the State that they are meant to benefit. Freeing up these HOME funds for worthwhile projects in non-metropolitan areas would greatly benefit low-to-moderate income residents who live in Indiana's hinterlands.

Again, thank you for the opportunity to express our comments about the Consolidated Plan. We look forward to our continued partnerships with the Indiana Housing Finance Authority and the Indiana Department of Commerce and hope that you will favorably consider some of our recommendations.

Sincerely,

Ellen K. Davis

Development Director

Cc: The Honorable Joseph Kernan, Governor

The Honorable Kathy Davis, Lt. Governor

The Honorable Johnny Nugent, State Senator

The Honorable James A. Lewis, State Senator

The Honorable Paul E. Allen, State Senator

The Honorable Robert A. Hoffman, State Representative

The Honorable Thomas E. Saunders, State Representative

The Honorable Phil Pflum, State Representative

The Honorable Cleo Duncan, State Representative

The Honorable Robert J. Bischoff, State Representative

The Honorable Markt L. Lytle, State Representative





RECEIVED

May 10, 2004

Ms. Ellen Davis LifeTime Housing Group 13091 Benedict Drive Dillsboro, Indiana 47018

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Ms. Davis:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

You raised three main concerns in your letter: removing the limit on in-kind matches; funding for affordable housing infrastructure; and the allocation of HOME Investment Partnerships Program (HOME) dollars to the First Home Program.

The Department of Commerce is currently reviewing its policy on increasing the amount allowed for in-kind match. A decision should be made prior to Round I 2005.

The State's current allocation of Community Development Block Grant (CDBG) dollars for affordable housing infrastructure is based on historical demand for such projects. As noted in the 2004 Plan, the \$300,000 proposed allocation represents the amount that is likely to be allocated for this activity if grant applications are representative of those in past years. More or less might be spent on affordable housing infrastructure during the 2004 program year if demand for the projects differs from what it has been in the past. In the past, the use of CDBG funds for affordable housing infrastructure has not been the most efficient method of maximizing the amount of grant dollars that assist low income populations. As such, the State plans to leave the allocation goal at \$300,000 for the current program year.

The State's priority for the use of CDBG funds is to focus on preservation of affordable housing. This is accomplished through public infrastructure

improvements that help low and moderate income populations receive adequate public services without substantial increases in costs.

Since program inception, IHFA has allocated approximately 73% of Indiana's HOME funds outside of participating jurisdictions and the remaining 27% within the participating jurisdiction areas.

The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home. In the 2004 program year, only 9 percent of HOME funds are proposed to be allocated to the State's First Home program.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Kelly Boe Manager, Finance and Administration

Indiana Department of Commerce

Sheryl Sharpe

Director of Operations

Indiana Housing Finance Authority

Paula Lucas

From:

Heidi Aggeler

Sent:

Monday, May 10, 2004 2:28 PM

To:

Paula Lucas

Subject:

FW: Comments on IN 2004 Draft Consolidated Plan for Housing



IKE Cons Plan Comments - 4-15-...

----Original Message----

From: Sheryl Sharpe [mailto:SSharpe@ihfa.state.in.us] Sent: Monday, April 19, 2004 10:46 AM To: BBC - Heidi Aggeler (E-mail)

Cc: Michelle Kincaid; Erika Scott; Lisa Coffman

Subject: FW: Comments on IN 2004 Draft Consolidated Plan for Housing

FYI - We need to get together on this end to discuss whether we will recommend any changes to the con plan based on these comments, but I wanted to go ahead & forward this to you in case you have any thoughts or suggestions.

----Original Message----

From: Mark Young

Sent: Friday, April 16, 2004 9:21 AM To: Kimberly Wize; Sheryl Sharpe

Subject: FW: Comments on IN 2004 Draft Consolidated Plan for Housing

----Original Message-----

From: Tom Neltner [mailto:neltner@ikecoalition.org]

Sent: Friday, April 16, 2004 9:07 AM

To: Erika Scott; Mark Young

Cc: John Hall; Jack Leonard; Matt Waldo; Paula Smith; Joan Ketterman; Dave McCormick; Karla Johnson; John Casey; Tom Neltner; Bill Beranek; Richard Van Frank; Don Ryan; Amy

Hesting; James Evans; Indra Frank

Subject: Comments on IN 2004 Draft Consolidated Plan for Housing

Erika and Mark,

Attached are IKE's comments on the Draft 2004 Consolidated Plan for Indiana. I will be mailing in the hard copy. I appreciate the opportunity!

Let me know if you have any questions or concerns.

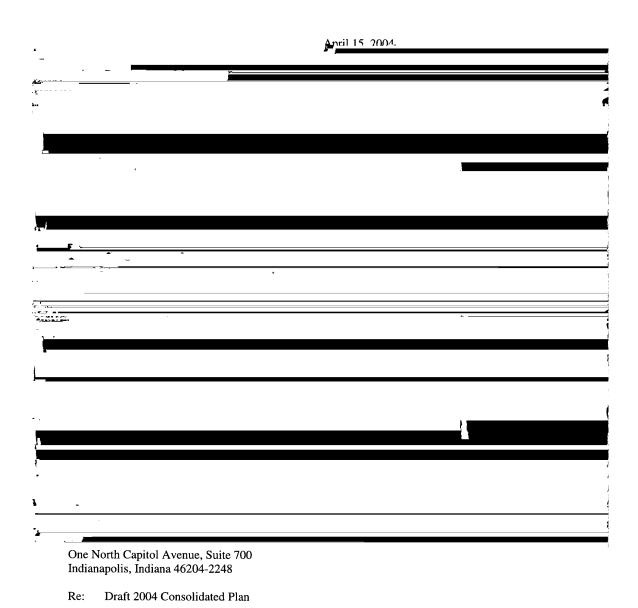
Tom Neltner Improving Kids' Environment 317-442-3973 Fax 317-283-6111 neltner@ikecoalition.org

Disclaimer - 4/19/2004

This email and any files transmitted with it are confidential and intended solely for BBC - Heidi Aggeler (E-mail), Michelle Kincaid, Erika Scott, Lisa Coffman. If you are not the named addressee you should not disseminate, distribute, copy or alter this email. Any views or opinions presented in this email are solely those of the author and might not

Improving Kids' Environment

5244 Carrollton Avenue Indianapolis, IN 46220 www.ikecoalition.org Fax: 317-283-6111 317-442-3973 neltner@ikecoalition.org



To Whom It May Concerns

The lead poisoning information is seriously incomplete. It appears to have been an update from the last Plan with little acknowledgement to the accomplishments made. It continues to set very low goals for lead poisoning prevention.

Currently, housing redevelopment projects are avoiding old homes because of lead-based paint hazards. Rather than incur the additional costs to managing the lead consistent with state and federal rules, they are looking at other homes unlikely to have lead hazards. Yet, these older homes with lead continue to be occupied and to poison children. ISDH reports that 1300 homes have poisoned children at different times. Marion County Health Department has issued citations to reduce lead hazards in more than 1100 homes.

Our housing program has been forced to focus away from the homes that need help the most. The City of Indianapolis received a \$1.7 million grant in 2002 to try to avoid this distortion of priorities. It also applied for \$3.5 million more in 2003 to further supplement the effort. Unfortunately, HUD said "no" to the second grant. No other housing agency or community in Indiana has applied for HUD Lead Hazard Control Grants to prevention lead poisoning despite the need. Without more money and stronger objectives, we appear to be accepting the fact that these older homes cannot be addressing with CDBG or HOME funds. Too many children of residents in those homes appear consigned to be lead poisoned. In addition, the moisture that creates asthma triggers in a home also creates the deteriorated paint that leads to lead poisoning. Intact paint in good condition is not a significant threat to children's health.

We need an objective of aggressively pursuing HUD funding so all local redevelopment projects can set priorities based on the need of the residents and the community and not to avoid the cost of dealing with lead-based paint.

Rental housing is the highest risk. Between January 1, 2000 and July 31, 2003, Marion County Health Department issued citations for lead hazards to more than 200 residences. More than 99% of those homes were rental property. Many landlords – primarily the small landlords with less than 50 properties – seem unaware of their responsibility under IC 32-31-8-5 to comply with the housing code and to give the property to the tenant in safe condition. However, since lead hazards are often invisible, they are often ignored. Tenants are also often ignorant of their responsibilities.

The Consolidated Plan needs to acknowledge that the Indiana General Assembly adopted a law that went into effect in July 1, 2002 that established specific obligations for landlords and tenants. It also needs to establish an objective of aggressively educating both tenants and landlords of their responsibilities under the 2002 law. It also needs an objective of educating small claims court judges who handle these cases so the judges are aware of the law and have a sense of its application. Too often the tenant is goes to court without an attorney and is unable to make the proper case to the judge. We should find a way to resolve these problems through education and not protect only tenants who are wealthy enough to hire an attorney.

The 2002 Indiana General Assembly also adopted strong new restrictions on work practices at housing that mentioned only obliquely in the plan. It is now a Class D felony to dry-sand, dry-scrape or burn paint in housing built before 1960. It is also a Class D felony to leave painted debris behind after working on these homes. While there are exceptions, the plans omission on this issue is troubling.

The Consolidated Plan should set an objective of educating contractors and clients about the law and monitoring projects to ensure compliance with the law. Enforcement should be coordinated with the Indiana Department of Environmental Management.

The Consolidated Plan makes no reference to the most powerful tool to bring us out of ignorance when it comes to lead poisoning. If a buyer or a tenant is aware of the potential lead hazards, he or she can take steps to address the problem. For that reason, HUD requires disclosure of lead hazards to potential buyers and tenants. In the sales situation, the disclosure requirements appear to have been institutionalized. But in the rental situation, IKE's research indicates dismal compliance efforts. The Plan needs an objective of monitoring compliance with the HUD disclosure rules, educating its clients and contractors about the law, and ensuring that the documents identifying specific hazards in a home are given to buyers and tenants consistent with federal law. HUD is working hard to enforce the law but needs a local presence. Programs that use HUD funds to rehabilitate homes should be in a leading role in assuring compliance.

The U.S. Environmental Protection Agency also requires that a contractor notify the owner and occupant when more than two square feet of interior paint is disturbed. The contractor must give a special EPA booklet to the owner and the occupant and either must send it by certified mail or get a written acknowledgement of receipt. Few contractors are complying with this law. Like disclosure, the Plan needs an objective of monitoring compliance with the EPA's Pre-Renovation Notice rule, educating its clients and contractors about the law, and ensuring that the documentation is complete.

With these general comments in mind, attached are IKE's comments on the specific language in the draft Consolidated Plan.

Again, I appreciate the opportunity to comment on this plan. It is a challenge to cover the wide array of issues. The draft plan does a good job of addressing many. But the problems surrounding asthma and lead poisoning need more. The issue has evolved to a stage where the health of children across Indiana demands stronger objectives and commitments to protect their health.

For more information on the issues, please check out www.ikecoalition.org or contact me at 317-442-3973 or neltner@ikecoalition.org.

Sincerely,

Thomas G. Neltner, JD, CHMM Executive Director

Comments on Specific Languages in the Draft Consolidated Plan Prepared by Tom Neltner of Improving Kids' Environment on April 15, 2004

The page references are to the PDF version of the document downloaded from IHFA's website at at www.in.gov/ihfa/comdev/conplan/plan.htm. For more information, contact Tom Neltner at 317-442-3973 or neltner@ikecoalition.org. My comments are in italics.

P27 of 358

Homes built before 1940 on average have paint with 50 percent lead composition. Twenty percent of renters live in housing that was built pre-1940 and 20 percent of owners live in pre-1940 housing stock. Approximately, 8 percent of all renters earn less than 51 percent of the AMI and live in housing stock built pre-1940 while 4.6 percent of all owners live in the same conditions. Why is 1940 the date used in this paragraph? The Indiana General Assembly used a cutoff of 1960. Some programs in HUD and other agencies refer to 1950. The only program to use 1940 was the July round of HUD Lead Demonstration Grants which used pre-1940 rental property to identify the Top 75 eligible cities. The date and statistics should be changed to 1960.

I have no idea where the "50% lead composition" term comes from. Any lead containing more than 0.5% lead is considered by Indiana and HUD to be lead-based paint. While lead can make up 50% of the paint, it is unusual. I think what might have been intended is that 50% of the pre-1940 homes have lead-based paint in them. That is totally different that what is stated. Any lead-based paint would qualify.

Page 81 of 358

Lead Based Paint Hazards

As in 2003, the 2004 survey included several questions to determine how much of a problem lead based paint hazards are in communities. Survey respondents were provided with a scale of one to five to rank the increase in housing costs because of lead abatement, with one being the least and five being the most. Most survey respondents said that lead abatement procedures increase the cost of providing affordable housing a moderate to high amount. The distribution of responses is shown in Exhibit III-25

In addition, 72 percent of survey respondents said there were not adequate funds in their communities to address lead based paint hazards in housing, compared to 70 percent in 2003 and 77 percent in 2002. Over half of respondents agreed that there was a need for funds to address lead based paint in housing with poisoned children. Sixty-five percent of those surveyed said there was a need for a partnership between housing and health care providers to address lead based paint hazards — which is up from 60 percent in 2003 but down from 77 percent in 2002. Over the three-year study period, the survey questions do not indicate a worsening or improving trend for lead based paint hazards. However, because the percentages are high throughout this study period, there is a need for greater funding and attention directed at dealing with lead based paint hazards

I believe the survey question would have gotten even higher numbers if it asked whether the cost of lead-based paint hazard control caused the program to adjust its priorities. I believe that many respondents have simply adjusted their priorities to avoid homes with lead-based paint.

Page 105 of 358

Age. Age can also be a proxy for the condition of housing, especially the risk of lead-based paint. As discussed later in this section, units built before 1940 are most likely to contain lead based paint. Units built between 1940 to 1978 have a lesser risk (lead was removed from household paint after 1978), although many older units may have few if any problems depending on construction methods, renovation and other factors.

As noted before, 1940 is an improper cutoff. Housing built in the 1940s had lead hazards at only a slightly lower rate than before 1940. Keep in mind that lead-based paint was more expensive than other paint which limited its use during the depression. And lead was a valuable commodity during World War II. The paint industry voluntarily started phasing out lead-based paint in 1950. Exterior uses continued to dominate until 1960. The plan should be consistent with the Indiana General Assembly that used 1960.

Housing age data from the 2002 ACS indicate that almost 29 percent of the State's housing units, occupied or vacant, was built before 1940, when the risk of lead based paint is the highest. Approximately 70 percent of the housing stock was built before 1979. As of the 2000 Census, the median age of housing stock in the State was 34 years old. Exhibit IV-8 presents the distribution of housing units in the State by age.

Again, 1940 is the wrong date to use to properly characterize the hazards or target resources to protect children from lead poisoning.

Page 108 of 358

Lead Safe Housing

Environmental issues are also important to acknowledge when considering the availability, affordability and quality of housing. Exposure to lead based paint represents one of the most significant environmental threats from a housing perspective.

The hazard is from deteriorated lead-based paint and the lead dust on the floor and window sills as well as in the soil that pose the hazard. Intact lead-based paint is not the hazard.

Dangers of lead-based paint. Childhood lead poisoning is one of the major environmental health hazards facing American children today. As the most common high-dose source of lead exposure for children, lead-based paint was banned from residential paint in 1978. Housing built prior to 1978 is considered to have some risk, but housing built prior to 1940 is considered to have the highest risk. Children are exposed to lead poisoning through paint debris, dust and particles released into the air, which can be exacerbated during a renovation. Young children are most at risk because they have more hand-to-mouth activity and absorb more lead than adults.

Again, it should be 1960 not 1940. The danger is not from dust and particles released into the air. It is from the dust and particles that have settled on the floor or window sills where children consume them when playing on the floor. It is also from playing in contaminated soil. The dominant route of exposure is from ingestion not inhalation.

Excessive exposure to lead can slow or permanently damage the mental and physical development of children ages six and under. An elevated blood level of lead in young children can result in learning disabilities, behavioral problems, mental retardation and seizures. In adults, elevated levels can

decrease reaction time, cause weakness in fingers, wrists or ankles, and possibly affect memory or cause anemia. The severity of these results is dependent on the degree and duration of the elevated level of lead in the blood.

Lead-poisoned children have special housing needs. The primary treatment for lead poisoning is to remove the child from exposure to lead sources. This involves moving the child's family into temporary or permanent lead-safe housing. Lead-safe housing is the only effective medical treatment for poisoned children and is the primary means by which lead poisoning among young children can be prevented. Many communities have yet to plan and develop adequate facilities to house families who need protection from lead hazards.

Extent of the problem. Homes built before 1940 on average have paint with 50 percent lead composition. Inadequately maintained homes and apartments are more likely to suffer from a range of lead hazard problems, including chipped and peeling paint and weathered window surfaces.

See comments made above.

Approximately 1.8 million housing units in Indiana – more than 70 percent of the total housing stock – were built before 1978. About 540,000 units, or 21 percent of the housing stock, are pre-1940. Urban areas typically have the highest percentages of pre-1940 housing stock, although the State's non-entitlement areas together have about the same percentage of pre-1940 units as the State overall.

Lower income populations generally have more difficulty making repairs to their homes because of their income constraints and often live in older housing because it is usually the least expensive housing stock. This combination of factors make lower income populations most susceptible to leadbased paint hazards. One measure of the risk of lead-based paint risk in housing is the number of households that are both low income and live in older housing units. According to PUMS data, in 2002, there were 53,233 (8.1 percent) of all renter households that were very low income (earning less than 50 percent of the state median) and lived in housing stock built before 1940. There were also 77,919 (4.6 percent) of all owners with very low income and who lived in pre-1940 housing stock. These households are probably at the greatest risk for lead-based paint hazards.

This comment misses the point. Tenants do not want to put money into repairing deteriorated paint. The paint should be in good condition. It is the landlord's job according to state law since deteriorated paint is a violation of most housing codes and is a health hazard. Even if the tenant had the money, he or she are reluctant to use it to do the landlord's work.

The Centers for Disease Control and Prevention reports that from 1995 to 1999, 144,000 Indiana children were screened for lead. Nine percent of these children were determined to have elevated levels of lead in their blood. According to the Indiana State Department of Health, Indiana has more than 13,000 active cases of children with lead poisoning and more than 2 million homes with lead based paint. There is an average lifetime cost to taxpayers of \$250,000 per lead poisoned child.

There is more recent information. Since we are making progress in the fight against lead poisoning, it is important to use the latest information. According to the Indiana State Department of Health's report to the Indiana General Assembly, 35,087 blood lead samples were taken in 2003 for children

younger than seven years old. 691 children were confirmed as lead poisoned. Another 572 children failed a screening blood lead test and may or may not have been lead poisoned.

Therefore, addressing the problem through existing and new housing rehabilitation programs is fundamental to reach the Indiana and federal goal of eliminating childhood lead poisoning by the year 2010.

Available resources. The Residential Lead-Based Hazard Reduction Act of 1992 (commonly referred to as Title X) supports widespread prevention efforts of lead poisoning from lead-based paint. The Title X program provides grants of between \$1 million and \$6 million to states and local governments for lead abatement in privately owned housing or housing units on Superfund/Brownfield sites. Since the program's inception in 1993 through 2002, approximately \$703 million in grants have been awarded to 37 States and the District of Columbia.

The City of Indianapolis was the only Indiana community to apply for the grants. It received \$1.7 million in 2002 with the contract signed in 2003.

In addition to available funding from the Title X program, recent changes to the Community Development Block Grant (CDBG) program have added lead based paint abatement to eligible activities for CDBG funding. In order to receive Title X or CDBG funding, States must enact legislation regarding lead-based paint that includes requirements of accreditation or certification for contractors who remove lead-based paint. Indiana adopted such legislation in 1997 (Indiana Code, 13-17-14).

Recent changes? When were these changes?

The State of Indiana Department of Environmental Management (IDEM), in conjunction with the Department of Health and the Marion County Health Department, developed the "Lead for 2000" campaign. Initiated in 1998, the campaign was aimed at reducing the incidence of childhood exposure to harmful lead-based contaminants. Since 1998, IDEM has trained more than 100 lead assessors, and they have completed more than 1,300 lead assessments in homes and child care facilities. This effort entailed training lead-assessors, promoting awareness of the health risks that lead exposure presents, and educating families in methods that they can apply to minimize the risks presented by exposure to lead. These efforts are aimed at private homes as well as child-care facilities when children may be at risk.

Check with IDEM. I think the name of the program is wrong. I thought it was "2000 Families by 2000". IDEM has published the results of the program.

In September 2000, HUD adopted new requirements for lead evaluation of multifamily properties that are federally assisted for new applicants of mortgage insurance. In general, the regulations require the testing and repair of all of the properties acquired or rehabilitated through federal programs. In preparation for the new requirements, IHFA sent a list of the new requirements to its HOME and CDBG recipients and held a training to assist grantees with implementation of the new requirements in April and May of 2001.

The U.S Department of Energy updated its program guidelines and procedures in July 2002 of the Weatherization Assistance Program. This action updates guidance on health and safety issues and

provides lead-safe weatherization protocol work in buildings that might contain lead paints. In September 2000, the Department of Energy also updated its regulations for administration of the Weatherization Assistance Program. This update further protects residents of HUD program housing and other federally owned or assisted homes from the dangers of lead-based paint by ensuring proper remediation and mitigation protocol when weatherizing these units.

Indiana's Weatherization program goes far beyond the federal minimum when it comes to lead-based paint hazards during weatherization. Community Action Agencies received training and XRF equipment so they could properly identify lead-based paint and lead hazards. FSSA has adopted specific policies and procedures to protect children.

For several years, IHFA has provided funding to The Indiana Association of Community Economic Development and the Environmental Management Institute (EMI) to provide lead inspection, risk assessor and lead supervision training, certification, and refresher courses. EMI is the State's largest provider of lead hazard training and offers supervisor, risk assessor and inspector training throughout the State.

In addition, EMI and Improving Kid's Environment (IKE) conducted the second annual Lead-Safe Conference in October 2003, which provided information about improving compliance with lead hazard reduction methods. Two organizations offered accredited lead risk assessor training and lead inspector refresher training as part of the annual conference.

Only lead refresher training was offered. No initial training was offered. The refresher training was for supervisor and risk assessor and not inspector.

A major challenge in mitigating lead hazards in Indiana has been increasing the number of abatement contractors. During 2002, two major changes were made to improve Indiana's numbers:

- IDEM recently streamlined its contractor licensing process; and
- EMI and IKE worked together to clarify the type of insurance required by IDEM for contractors. IDEM had been suggesting that contractors purchase specialty insurance that was cost prohibitive.

The rule change took place in October 2003 not 2002. I believe the clarification on insurance occurred in April of 2003.

On October 10, 2003, Indiana placed revisions to its lead-based paint activities rules. These revisions amended rules concerning the licensing of individuals and contractors engaged in lead-based paint and training activities. It also added and repealed text concerning work practice standards for nonabatement activities.

I am not sure what text was repealed, but the addition was significant and deserves an explanation. Actually, the rule change did not impose any new requirements. It simply captured requirements already established in statute by the 2002 Indiana General Assembly which adopted strong new restrictions on work practices at housing. It is now a Class D felony to dry-sand, dry-scrape or burn paint in housing built before 1960. It is also a Class D felony to leave painted debris behind after working on these homes. While there are exceptions, the omission of this law in the Plan is troubling.

A plan is also being developed by the Indiana State Department of Health's Lead Elimination Plan Action Committee (EPAC) to eliminate lead poisoning in Indiana by 2010. The U.S. Centers for Disease Control and Prevention expects a draft plan in 2004.

The plan must be finalized by June 2004.

Page 214 of 358

g. Continue working to reduce the environmental hazards in housing, including lead based paint risks.

- Action Items to be Monitored. The Committee will support a team effort between IACED
 and IHFA to provide lead inspectors and assessors certification courses and training to
 grantees about the hazards of lead based paint and safe work practices.
- Also, the Committee will work to understand why the training for lead abatement contractor certification is being underutilized, despite a need for such contractors in nonentitlement communities.
- Accomplishments. In 2002, the training program was completed. IACED and IHFA have
 determined that there is not a need for the training every year; training will likely be held
 every two to three years.
- During 2004, IHFA added another eligible activity in the Housing From Shelters to Homeownership application package, which is Voluntary Acquisition/Demolition of developments where: 1) Structure is located in the floodplain that sustained substantial damage (50% or more); 2) Structures located within the flood way; or 3) Structures located within the flood fringe (below protection elevation).

See cover letter for specific objectives that need to be added. Also, the training for abatement contractors is underutilized because it is not needed. Few homes are triggering the threshold where abatement is required. To my knowledge, only Fort Wayne and Bloomington have experienced problems with abatement contractors. Thanks to various IHFA supported efforts and the local programs persistence, those gaps have generally been filled. It is tough to get interest without demand and the increased number of abatement contractors in 2003 helped meet the demand.

However, training on HUD-approved lead-safe work practices is occurring and attendance is strong. That – and supervisor training are much more important.

The accomplishments does not mention:

- IHFA's support for four to six Indiana Lead-Safe and Healthy Homes newsletters distributed by email or fax to more than 600 people each year at no cost.
- IHFA's support for the Lead-Safe Indiana Task Force which convenes stakeholders quarterly to discuss issue.
- The four brochures IDEM supported that defined the legal responsibilities regarding lead-based paint for contractors, property managers, risk assessors, and building permit holders.
- The City of Indianapolis' receipt of a \$1.7 million Lead Hazard Control Grant from HUD.
- General Assembly's adoption of prohibitions on dangerous work practices involving lead and its requirement to clean-up debris.
- IDEM's rewrite of its lead-based paint activities rule to improve compliance and access to resources especially in areas of Indiana adjacent to cities across the border that have licensed people.
- HUD's support for a project to improve disclosure enforcement in rental property.



May 11, 2004

Mr. Thomas G. Neltner Executive Director Improving Kids' Environment 5244 Carrolton Avenue Indianapolis, Indiana 46220

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Mr. Neltner:

Thank you for your comments on the State of Indiana's 2004 Draft Consolidated Plan. The State worked hard to involve citizens and stakeholders in the planning process and thanks you for your contribution to the Plan.

Although the 2004 Plan is only an annual update to the State's Five Year Consolidated Plan, the State does make every effort to add the most recent information and data on the State's needs to every update. The information in the lead-based paint section was reviewed and new information was added to the 2004 Plan, including many of the details you included in your letter. We trust that you will find the lead-based paint hazards section in the revised plan up to date and complete.

You will also be pleased to know that the State has added a section to the 2004 Consolidated Plan on Environmental Issues that includes Asthma and Lead Based Paint. In this section, activities of the Indiana Joint Asthma Council (INJAC) are described.

In your letter, you proposed a number of recommendations for State activities related to environmental hazards in housing. In response to many of your comments:

- In past years, the Indiana Housing Finance Authority (IHFA) has adjusted the amount of dollars eligible for rehabilitation to include the costs of lead-based paint cleanup.
- In addition, IHFA monitors compliance with HUD rules for disclosure of lead hazards and includes in manuals and documents to grantees information about how to identify lead based paint hazards.
- As you acknowledged in your letter, Niles Parker from the Indiana Department of Commerce serves on INJAC. The Consolidated Plan Coordinating Committee will ask Mr. Parker to keep the Committee abreast of the activities in INJAC. In addition, the Committee will ask a representative from the Indiana Department of Environmental Management (IDEM) to brief the Committee on issues of lead-based paint and asthma in housing and communities during the upcoming program year, to



30 SOUTH MERIDIAN STREET, SUITE 1000, INDIANAPOLIS, IN 46204
TELEPHONE: (317) 232-7777 • TOLL-FREE WITHIN INDIANA: (800) 872-0371 • FACSIMILE: (317) 232-7778
WORLD WIDE WEB: HTTP://www.indianahousing.org • Equal Opportunity Employer And Housing Agency
Printed on Recycled Paper



facilitate better coordination of Consolidated Planning activities with IDEM initiatives and projects.

Thank you again for your comments. We hope you will stay involved in future Consolidated Planning processes.

Sincerely,

Sheryl M. Sharpe Director of Operations

SherylM Sharpe

Paula Lucas

From: Heidi Aggeler

Sent: Monday, May 10, 2004 2:28 PM To: Paula Lucas Subject: FW: Comments on Consolidated Plan

----Original Message----

From: Sheryl Sharpe [mailto:SSharpe@ihfa.state.in.us] Sent: Monday, April 19, 2004 10:47 AM To: BBC - Heidi Aggeler (E-mail) Cc: Erika Scott; Michelle Kincaid

Subject: FW: Comments on Consolidated Plan

Here's another comment we received directly.

----Original Message----

From: Kimberly Wize

Sent: Wednesday, April 14, 2004 3:55 PM

To: Cobb Nancy

Cc: Erika Scott; Michelle Kincaid; Mark Young; Sheryl Sharpe

Subject: Comments on Consolidated Plan

Thank you for your comments, I will forward them on to our staff for review and consideration and they will follow up with you if they have any questions. If you have any questions, please contact Mark, Erika Scott, Allocation Manager or Michelle Kincaid, Compliance Manager. Thanks

Kimberly Wize

----Original Message----

From: Cobb Nancy

Sent: Wednesday, April 14, 2004 1:46 PM To: Kimberly Wize

Subject: Comments on Consolidated Plan

Thank you for your time this morning. Your comments and suggestions were very helpful and the opportunities for collaborating together at both the state and local levels are exciting.

Below are our comments. I hope they are they are stated in a way that is understandable. The "shoulds" are, of course, from out point of view.

ICLPPP'S SPECIFIC COMMENTS ON DRAFT PLAN

Lead-safe housing issues are discussed briefly in Section IV, pages 12-14 and in Section VI, page 13.

1.Section V - Section IV, page 12, paragraph 5 begins with the statement "Lead-poisoned children have special housing needs." However, there is no mention of lead-poisoned children in Section V, which is entitled "Special Needs Populations." Lead-poisoned children should be listed as a separate category in Section V. Programs could be identified that can assist this population. Dwellings of lead poisoned children could be prioritized for rehabilitation and remediation.

2. Section VI, page 13 - The objective states that the State will "Continue working to reduce the environmental hazards in housing, including lead based paint risks." However, the only action item mentioned is to monitor and continue existing training activities.

1

Funding of actual hazard control and relocation assistance activities should be a component of the plan. There could be a list of the programs in the plan under "g" (including HOME, IDA, Rental Housing Tax Credit, and Transitional Housing) that will incorporate lead hazard control as a top program priority.

3.Section VI, page 15 - A new letter "f" could be added that states that the Indiana Department of Commerce and IHFA will work to include in awards made to domestic violence and homeless shelters stipulations for childhood blood lead testing as a component of the award. Award recipients would arrange for an initial risk assessment by an Indianalicensed risk assessor, in order to determine if lead hazards are present in the shelters that would put children at risk.

Again, thank you. It was a pleasure getting to know you and IHFA's work better.

Nancy Cobb, Director Lead and Children's Environmental Health Indiana State Department of Health 2 N. Meridian Street, 5J Indianapolis, IN 46204 P 317/234-2273 F 317/233-1630 ncobb@isdh.state.in.us

Disclaimer - 4/19/2004

This email and any files transmitted with it are confidential and intended solely for BBC - Heidi Aggeler (E-mail), Erika Scott, Michelle Kincaid. If you are not the named addressee you should not disseminate, distribute, copy or alter this email. Any views or opinions presented in this email are solely those of the author and might not represent those of Indiana Housing Finance Authority. Warning: Although Indiana Housing Finance Authority has taken reasonable precautions to ensure no viruses are present in this email, the company cannot accept responsibility for any loss or damage arising from the use of this email or attachments.



May 11, 2004

Nancy Cobb, Director Lead and Children's Environmental Health Indiana State Department of Health 2 North Meridian Street, 5J Indianapolis, Indiana 46204

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Ms. Cobb:

Thank you for your email about ICLPPP's comments on the 2004 Draft Consolidated Plan.

You suggested a number of activities for the State to undertake related to mitigating lead-based paint risk in housing.

Lead-poisoned children. In your email, you recommend adding lead-poisoned children as a special needs population in the Consolidated Plan. In the 2004 Update, the State included Youth as a special needs population for Consolidated Planning purposes for the first time. Currently, lead-based paint hazards of children are discussed in the Plan's lead-based paint section. The State intends to add a discussion of the housing and community needs of lead-poisoned children in future Consolidated Plans.

Funding for lead-based paint activities. In addition to monitoring and training, the State helps to mitigate lead-based paint hazards by providing funds to organizations that do rehabilitation work in housing, including addressing lead-based paint hazards.

Shelters and lead-based paint hazards. The Community Development Block Grant funds that are allocated to emergency shelters may be used to construct new shelters, which do not have leadbased paint hazards or may be used to rehabilitate existing shelters. For rehabilitation, this may include lead-based paint reduction activities. The State cannot require children staying in shelters to have blood tests.

Thank you for your thoughtful comments about the Plan. We hope you will stay involved in the process in the future.

Sincerely,

Sheryl M. Sharpe

Sheryl M. Sharpe

Director of Operations



30 SOUTH MERIDIAN STREET, SUITE 1000, INDIANAPOLIS, IN 46204 Telephone: (317) 232-7777 • Toll-Free Within Indiana: (800) 872-0371 • Facsimile: (317) 232-7778 WORLD WIDE WEB: http://www.indianahousing.org • Equal Opportunity Employer And Housing Agency PRINTED ON RECYCLED PAPER



Heidi Aggeler

From: Sent: To:

Erika Scott [EScott@ihfa.state.in.us] Monday, May 03, 2004 8:49 AM Heidi Aggeler

Subject:

FW: [WWW] Consolidated Plan 2003

----Original Message----From: Nicholas A. Murphy

Sent: Monday, May 03, 2004 8:41 AM

To: Erika Scott

Subject: FW: [WWW] Consolidated Plan 2003

----Original Message----

From: Marcy Wenzler [mailto:marcy.wenzler@ilsi.net] Sent: Friday, April 30, 2004 10:30 PM To: Nicholas A. Murphy

Subject: [WWW] Consolidated Plan 2003

subject: Consolidated Plan 2003

Name: Marcy Wenzler

Organization: Indiana Legal Services, Inc.

Email: marcy.wenzler@ilsi.net

Comments:

There's a great need to do more to get the word out about this process(especially for this upcoming 5 yr plan). I'm quite involved locally &statewide on housing issues (within and outside Indiana LegalServices), including active involvement in our local Continuum of Care consortium in Bloomington which meets monthly (the HousingNetwork). It seems very difficult to find out in advance the specificsof the process and when we can expect to participate. The regionalhearings are always in small communities, so it's not surprising thatonly 134 people were heard at 6 forums. The IACED/ICHHI joint annualconference is a perfect time to have a session describing this process& how we can be involved, as well as to actually hold a hearing tosolicit participants' ideas as to how to address these needs. Thereare hundreds of people there, many of whom would like to comment, andwe are probably at our best thinking during the conference when we'vehad a chance to network & talk about current issues.

My local entitlement community staff seem unaware of the statewideCon Plan process, so even if you manage to get involved locally incommenting on your own plan, local staff don't seem to have theinformation they need to let citizens know about the state Con Planprocess. Making a handout available thru local government would behelpful.

Indiana Legal Services, Inc. is now a statewide program for civillegal help for low income & elderly. We also are a frontlineanti-poverty agency & would welcome a chance to more activelyparticipate in the Con Plan process, such as consultation withnonprofits. For example, we published a study on Predatory Lending inIndiana, analyzing HMDA data (& updated in Dec. 2003 with some helpfrom AARP funding) about the impact of these practices on the highrate of foreclosures in Indiana, with detailed info about the subprimelending market and breakdown by race and income of the use of theseloans (as well as maps of the counties with the highest rates of subprime refinances). This would have been a good resource to examine. If you seek to address preserving the housing stock & saving homesthru foreclosure prevention, there needs to be mention of predatorylending (not to mention widespread home improvement fraud that impactsparticularly in seniors). Predatory lending practices prevent manyseniors and disabled people from being able to age in place or remainin their homes. There is mention in a couple of places about puttinginfo on financial managment into homebuyer or IDA classes, but thereneeds to be specific info about how to avoid predatory lendingpractices. Also, any new plan for marketing to minorities should havedetailed info about predatory lendings, as they are already

heavily "marketed" to by brokers & others who offer debt consolidation, etc.that jeopardizes the equity in their homes.

In prevention of predatory lending, especially as to all the loans orgrants that are funded by these agencies, I suggest that the programsbe required to have the beneficiaries of the funding get counselingbefore they can re-finance their loans or mortgage their homes. Toooften the agency, whether it's IHFA or a CAA, simply gets a call froma company or a client that wants a payoff figure on the loan so theycan get that "debt consolidation" loan that's going to make their lifeeasier by lowering their payments. If they were required to have thedocuments reviewed before re-financing, as I've done with severalclients, they'd find out the full extent of the fees & costs & otherprovisions, such as prepayment penalties or balloon payments or falseinfo on the applications or padded appraisals, that would likeloydissuade them from re-financing. At the same time, Indiana needs tohave a rescue fund that will allow people to get decent terms inre-financing when they've been the victim of predatory lending.

It was good to survey PHAs, but would have been helpful to survey PHAtenants. This could be done thru local resident councils, for example, at a minimum or the statewide resident council association. These arefolks who know a lot about housing & community development needs & impediments, but have very little ability to give input into thisprocess. Since PHAs have to do 5 yr & annual plans as well (which aresupposed to be coordinated with local plans), tenants are a logical source to solicit for info. Perhaps more coordination with HUD to getinfo out to tenants would be helpful.

Nationwide, there is a lot of attention being paid to manufacturedhousing as a significant component of addressing the lack ofaffordable housing for low-income people. Spearheaded by the FordFoundation, it would be good if Indiana was part of that process &made use of current research & analysis about the availability &promotion of such housing.

There is a need to better support the regional Continuum of Careconsortiums, including making available some funding for staff supportthat would make the coordination process more viable.

There is a huge need for training & education about fair housing, especially as it affects people with disabilities. It's been myunfortunate experience to be continually exposed to subsidized housingmanagers, public housing authority staff, even state agency staff whoinvestigate fair housing, who seem to have no idea about the specificsof reasonable accommodation for PWDs. The common view of "discrimination" is that if you treat someone of a different race, forexample, different than you treat another person, then it'sdiscrimination. While this is true for most categories, it is not truefor a reasonable accommodation of a PWD, where the legal obligation isto make an individual determination of a specific person's request foraccommodation and specifically treat that person differently than youwould someone else. If you don't, that's discrimination. Thewidespread lack of information about how that works impacts hundredsof disabled Hoosiers, both physically disabled and especially mentallydisabled, every day; people who are losing their homes unnecessarily. The state should be putting money into getting training for staff, whether it's the ICRC or Section 8 or PHAs, on this topic.

Thank you for the chance to comment. It was very educational to readthe draft & I look forward to increased participation & input in thefuture & using the document in our work.

B1: Submit

Disclaimer - 5/3/2004

This email and any files transmitted with it are confidential and intended solely for Heidi Aggeler (E-mail). If you are not the named addressee you should not disseminate, distribute, copy or alter this email. Any views or opinions presented in this email are solely those of the author and might not represent those of . Warning: Although has taken reasonable precautions to ensure no viruses are present in this email, the company cannot accept responsibility for any loss or damage arising from the use of this email or attachments.

Heidi Aggeler

Erika Scott [EScott@ihfa.state.in.us] From: Friday, May 21, 2004 9:35 AM Sent:

To: Heidi Aggeler

Subject: FW: [WWW] Consolidated Plan 2003

Response e-mailed to Marcy Wenzler.

----Original Message----

From: Erika Scott

Sent: Friday, May 21, 2004 10:33 AM

To: 'marcy.wenzler@ilsi.net'

Subject: FW: [WWW] Consolidated Plan 2003

Dear Ms. Wenzler:

Thank you for your suggestions for increasing public input into the State Consolidated

The Citizen Participation Process for the 2004 Update included a mailing of more than 4,000 flyers announcing the public forums to local government officials, nonprofits, housing and community development professionals, social service providers and others. Information about the process was also posted on the websites of the Department of Commerce and the Indiana Housing Finance Authority and public notices were distributed in advance of the public hearings.

The public forms and hearings are held in small communities for two reasons: 1) These communities are the target of much of the HUD grant funding and 2) To avoid confusing the statewide Consolidated Plan process with similar processes in entitlement communities.

Thank you for the information about your predatory lending research. This information could be very useful during the upcoming 5 year Consolidated Planning process. We look forward to learning more about predatory lending and fair housing issues from you during the next planning period.

Sincerely,

Erika E. Scott Allocation Manager Indiana Housing Finance Authority 1-800-872-0371

----Original Message----

From: Marcy Wenzler [mailto:marcy.wenzler@ilsi.net]

Sent: Friday, April 30, 2004 10:30 PM To: Nicholas A. Murphy

Subject: [WWW] Consolidated Plan 2003

subject: Consolidated Plan 2003

Name: Marcy Wenzler

Organization: Indiana Legal Services, Inc.

Email: marcy.wenzler@ilsi.net

Comments:

There's a great need to do more to get the word out about this process(especially for this upcoming 5 yr plan). I'm quite involved locally &statewide on housing issues (within and outside Indiana ${\tt LegalServices)}\,,\,\,{\tt including}\,\,{\tt active}\,\,{\tt involvement}\,\,{\tt in}\,\,{\tt our}\,\,{\tt local}\,\,{\tt Continuum}\,\,{\tt of}\,\,$

Care consortium in Bloomington which meets monthly (the HousingNetwork). It seems very difficult to find out in advance the specificsof the process and when we can expect to participate. The regionalhearings are always in small communities, so it's not surprising thatonly 134 people were heard at 6 forums. The IACED/ICHHI joint annualconference is a perfect time to have a session describing this processé how we can be involved, as well as to actually hold a hearing tosolicit participants' ideas as to how to address these needs. Thereare hundreds of people there, many of whom would like to comment, andwe are probably at our best thinking during the conference when we'vehad a chance to network & talk about current issues.

My local entitlement community staff seem unaware of the statewideCon Plan process, so even if you manage to get involved locally incommenting on your own plan, local staff don't seem to have theinformation they need to let citizens know about the state Con Planprocess. Making a handout available thru local government would behelpful.

Indiana Legal Services, Inc. is now a statewide program for civillegal help for low income & elderly. We also are a frontlineanti-poverty agency & would welcome a chance to more activelyparticipate in the Con Plan process, such as consultation withnonprofits. For example, we published a study on Predatory Lending inIndiana, analyzing HMDA data (& updated in Dec. 2003 with some helpfrom AARP funding) about the impact of these practices on the highrate of foreclosures in Indiana, with detailed info about the subprimelending market and breakdown by race and income of the use of theseloans (as well as maps of the counties with the highest rates of subprime refinances). This would have been a good resource to examine. If you seek to address preserving the housing stock & saving homesthru foreclosure prevention, there needs to be mention of predatorylending (not to mention widespread home improvement fraud that impactsparticularly in seniors). Predatory lending practices prevent manyseniors and disabled people from being able to age in place or remainin their homes. There is mention in a couple of places about puttinginfo on financial managment into homebuyer or IDA classes, but thereneeds to be specific info about how to avoid predatory lendingpractices. Also, any new plan for marketing to minorities should havedetailed info about predatory lendings, as they are already heavily "marketed" to by brokers & others who offer debt consolidation, etc.that jeopardizes the equity in their homes.

In prevention of predatory lending, especially as to all the loans orgrants that are funded by these agencies, I suggest that the programsbe required to have the beneficiaries of the funding get counselingbefore they can re-finance their loans or mortgage their homes. Toooften the agency, whether it's IHFA or a CAA, simply gets a call froma company or a client that wants a payoff figure on the loan so theycan get that "debt consolidation" loan that's going to make their lifeeasier by lowering their payments. If they were required to have thedocuments reviewed before re-financing, as I've done with severalclients, they'd find out the full extent of the fees & costs & otherprovisions, such as prepayment penalties or balloon payments or falseinfo on the applications or padded appraisals, that would likeloydissuade them from re-financing. At the same time, Indiana needs tohave a rescue fund that will allow people to get decent terms inre-financing when they've been the victim of predatory lending.

It was good to survey PHAs, but would have been helpful to survey PHAtenants. This could be done thru local resident councils, for example, at a minimum or the statewide resident council association. These arefolks who know a lot about housing & community development needs &impediments, but have very little ability to give input into thisprocess. Since PHAs have to do 5 yr & annual plans as well (which aresupposed to be coordinated with local plans), tenants are a logical source to solicit for info. Perhaps more coordination with HUD to getinfo out to tenants would be helpful.

Nationwide, there is a lot of attention being paid to manufacturedhousing as a significant component of addressing the lack ofaffordable housing for low-income people. Spearheaded by the FordFoundation, it would be good if Indiana was part of that process & made use of current research & analysis about the availability & promotion of such housing.

There is a need to better support the regional Continuum of Careconsortiums, including making available some funding for staff supportthat would make the coordination process more viable.

There is a huge need for training & education about fair housing, especially as it affects people with disabilities. It's been myunfortunate experience to be continually exposed to subsidized housingmanagers, public housing authority staff, even state agency staff whoinvestigate fair housing, who seem to have no idea about the specificsof reasonable accommodation for PWDs. The common view of "discrimination" is that if you treat someone of a different race, forexample, different than you treat another person, then it's discrimination. While this is true for most categories, it is not true for a reasonable accommodation of a PWD, where the legal obligation isto make an individual determination of a specific person's request for accommodation and specifically treat that person differently than youwould someone else. If you don't, that's discrimination.

The widespread lack of information about how that works impacts hundredsof disabled Hoosiers, both physically disabled and especially mentally disabled, every day; people who are losing their homes unnecessarily. The state should be putting money into getting training for staff, whether it's the ICRC or Section 8 or PHAs, on this topic.

Thank you for the chance to comment. It was very educational to readthe draft & I look forward to increased participation & input in thefuture & using the document in our work.

B1: Submit

Disclaimer - 5/3/2004

This email and any files transmitted with it are confidential and intended solely for Heidi Aggeler (E-mail). If you are not the named addressee you should not disseminate, distribute, copy or alter this email. Any views or opinions presented in this email are solely those of the author and might not represent those of . Warning: Although has taken reasonable precautions to ensure no viruses are present in this email, the company cannot accept responsibility for any loss or damage arising from the use of this email or attachments.

SENT BY: CCLC IIDC:

IND DEPT OF COMMERCE

317 638 2392;

APR-30-04 17:50;

PAGE 2/4

INDIANA UNIVERSITY



INDIANA INSTITUTE ON DISABILITY AND COMMUNITY

Formerly the Institute for the Study of Developmental Disabilities April 30, 2004

Ms. Kelly Boe
Consolidated Plan
Indiana Department of Commerce
Controller's Office, Grants Management Division
One North Capitol Avenue, Suite 700
Indianapolis, IN 46204-2248

Dear Ms. Boe;

On behalf of the Back Home in Indiana Alliance, I am submitting a number of recommendations for the State Consolldated Plan, and for the use of federal HOME, CDBG, ESG and HOPWA funds. The Back Home in Indiana Alliance supports the use of these federal housing dollars to increase the availability of individualized and dispersed, affordable and accessible housing (rental or ownership) for people with disabilities.

People with low incomes and disabilities share a common need for safe and affordable permanent housing. The on-going challenge for many of these individuals is that they live on fixed or very limited incomes – often Supplemental Security Income (SSI) or Social Security Disability Income (SSDI). Access to typical, decent housing (homeownership and rental) is severely limited for many, and for those receiving SSI benefits, there continues to be not one single housing market in the U.S. where a person could afford to rent an efficiency or one bedroom apartment. (Source: Priced Out in 2000: The Housing Crisis Continues)

To increase the availability of individualized and dispersed, affordable and accessible rental housing the following use of funds, and incentives for housing developers is recommended:

Direct a portion of HOME funds for tenant based rental assistance. Rental housing often is permanent housing for people with very low incomes and disabilities. Using HOME funds to relieve the long waiting lists for Section 8 Housing Choice Vouchers directs a portion of these funds to the needlest households. In addition, the use of these funds could increase the availability of housing that is individualized and dispersed. A tenant based rental assistance program could assist individuals who need to be able to choose the location of their housing – housing that may be near public transportation, family members and other informal supports, support service providers, shopping, employment and other aspects of community life.

2853 Fasi Tenth Street Bloomington, Indiana 47408-2696

812-855-6508 Fax: 812-855-9630 TDD: 812-855-9396

A University Affiliated Program Committed to the Full Inclusion of Persons with Distribition IND DEPT OF COMMERCE

SENT BY: CCLC TIDC;

317 638 2392;

APR-30-04 17:50;

PAGE 3/4

In other words, tenant based rental assistance could enable a person to live in the community with the supports needed, rather than live in an institutionalized setting.

- The Consolidated Plan should guide PHAs to maximize the Section & Housing Choice Voucher program for people with disabilities by submitting applications to HUD for the Section 8 Mainstream Voucher program. As the Public Housing Agency (PHA) Plans are to be consistent with the Consolidated Plan, this directive may help to increase the availability of individualized and dispersed housing.
- Establish incentives for housing developers to leverage HUD 811 dollars, in combination with HOME and CDBG funds, to create affordable and/or accessible housing units within federally funded affordable rental properties.
- Leverage the use of Section 8 project based funds with HOME funds to
 increase the availability of affordable units for people with very low incomes and
 disabilities. It is suggested that a coordinated effort by IHFA, IDOC, and FSSA be
 established to determine how to blend the various federal affordable housing
 resources to address the housing crisis facing people with disabilities.
- Expand the use of HOPWA funds for tenant based rental assistance.
- Provide incentives for developers to construct more than the minimum requirement of accessible units for people with mobility, hearing and visual impairments in federally funded housing.
- Increase the amount of CDBG funds available for the development of affordable and accessible housing units, including home modifications.

To increase the availability of individualized and dispersed, affordable and accessible homeownership opportunities the following use of funds is recommended:

- Increase the amount of down payment assistance up to \$15,000 for people
 with low incomes and disabilities. People with SSI and SSDI, and with Medicaid
 coverage, are prohibited from accumulating savings (beyond minimal levels) and
 maintaining their disability related benefits.
- Given the low homeownership rate of people with disabilities direct a portion of HOME funds to assist people become first-time homebuyers.
- The Consolidated Plan should guide PHAs to implement the Section 8
 Homeownership program. This may be the only avenue for ownership and accessible housing for many people with disabilities.

2

_ SENT BY: CCLC IIDC;

317 638 2392;

APR-30-04 17:51;

PAGE 4/4

• Homeownership education and counselling is a critical component for first time homebuyers, including those with disabilities. A greater investment in the administrative costs of these programs continues to be recommended. The Neighborhood Reinvestment Corporation estimates that the average cost to administer a homeownership education and counseling program is between \$75,000 - \$100,000 per year, assuming that there is one full time counselor.

A 2001 Freddie Mac study indicates that this is a good investment of limited resources. Borrowers who received group counseling on average were found in a 90-day period to have a 19% lower delinquency rate. Borrowers who received individual counseling were found to have a 34% reduction rate in delinquency. Given the high rate of foreclosures in Indiana, the investment in counseling is a proven effective strategy to inform, protect and support homebuyers.

- Related to the need for homeownership counseling, is the need for adequate administrative funding support for non-profit housing organizations to invest the time required to develop affordable and accessible housing for people with very low to low incomes and disabilities. A blended funding approach and coordination across a number of organizations is typically needed to create affordable housing for people at or below 30% of median income. This is difficult and time consuming to accomplish.
- Invest funds in home repairs for current homeowners to maintain safe, decent and stable housing through CHDOs. Expand the availability of home repair funds by developing an IHFA homeowner loan program and by blending the HOME funds with IHFA's mortgage programs.

To increase the availability of individualized and dispersed, affordable and accessible homeownership and rental opportunities the following is recommended:

• Establish a home modification program as a new funding source to provide grants to local entities to carry out home modification programs that enable low and moderate income persons with disabilities to make the necessary modifications to their current home to make the home accessible. (See the Pennsylvania Access Grant Program administered by the Pennsylvania Department of Community and Economic Development for a state model).

Thank you for the opportunity for input into the ConPlan.

Sincerely,

Deborah McCarty Project Coordinator

Back Home in Indiana Alliance

Deborah Milait

3



May 11, 2004

Ms. Deborah McCarty Indiana Institute on Disability and Community 2853 East Tenth Street Bloomington, IN 47408-2696

Re: Comments on FY2004 Indiana Consolidated Plan Update

Dear Ms. McCarty:

Thank you for your comments on the State of Indiana's Draft Consolidated Plan. As you know, the State worked hard to involve citizens and stakeholders in the planning process and appreciates your contribution to the Plan.

You propose a number of solutions to increase the availability of affordable and accessible rental and homeownership housing. In response to many of your comments:

- You will be pleased to know that during the 2004 program year, the State has proposed that \$405,000 of Housing Opportunities for Persons with AIDS (HOPWA) funding be used for rental assistance, which is expected to benefit 170 households. In addition, the State is currently researching the need for a broader tenant based rental assistance program (TBRA) and will continue to do so during the FY2004 program year. It should be noted that HUD regulations limit TBRA to two years for programs funded through the HOME grant.
- The State will receive \$1,891,000 in funds from the American Dream Downpayment Initiative (ADDI) for Program Years 2003 and 2004, that will be allocated to assist low income, first time homebuyers acquire a home.
- The State is also monitoring the use and allocation of Section 8 vouchers in rural areas and continued funding of this program on the national level.

You and others have compiled a number of interesting proposals to improve housing conditions of persons with disabilities. Please know that the Consolidated Plan Coordinating Committee will take your other comments into consideration during future planning processes.

Sincerely,

Sheryl M. Sharpe

Director of Operations

SherylM Sharpe



30 SOUTH MERIDIAN STREET, SUITE 1000, INDIANAPOLIS, IN 46204 Telephone: (317) 232-7777 • Toll-Free Within Indiana: (800) 872-0371 • Facsimile: (317) 232-7778 WORLD WIDE WEB: HTTP://www.indianahousing.org • Equal Opportunity Employer And Housing Agency PRINTED ON RECYCLED PAPER

